Montana Fish, Wildlife & Parks

1400 South 19th Avenue
Bozeman, MT 59718
September 2, 2014

To: FWP Region 3 EA Standard Distribution List
Muffie Murray, PO Box 450, Green Farms, CT 06838-0450
Joe Poteat Revocable Trust, PO Box 400 Davidson, NC 28036-0400
Montana Ranch Corp, 7670 Woodway Dr. Ste 160, Houston, TX 77063-1593
John Bailey, 209 W. Park St., Livingston, MT 59047
Park County Conservation District, 5242 HWY 89 South, Livingston, MT 59047
Joe Brooks TU, PO Box 1378, Livingston, MT 59047
Sharon Rennie, 1723 Shields River Rd, Wilsall, MT 59086-9427
Shiell Anderson, 738 HWY 89 North, Livingston MT 59047
Sky Anderson, 785 HWY 89 North, Livingston, MT 59047
Daryl Stutterheim, 127 Laubscher Bodine Rd, Wilsall, MT 59086-9548
Daryl Shehan, PO Box 329, Clyde Park, MT 59018-0329
Alan Johnstone, 50 Indian Creek Rd, Wilsall, MT 59086-9562
Mike Dailey, 247 Shields River Road E., Livingston, MT 59047-9312
Steve Tomschin, 22 Bright Lane, Wilsall, MT 59086-9432

Ladies and Gentlemen:

The enclosed Decision Notice has been prepared for the Selective, Mechanical Removal of Nonnative Fishes in the Shields River Watershed Draft Environmental Assessment. Montana Fish, Wildlife & Parks (FWP) proposed removal of nonnative rainbow trout from waters upstream of Chadbourne Diversion and removal of nonnative brook trout in waters upstream of a proposed barrier upstream of Crandall Creek. Ten (10) public comments were received during the comment period that began July 16, 2014 and ended August 15, 2014.

The EA and Decision Notice may be obtained from FWP at the address provided above, or viewed on FWP's Internet website: http://www.fwp.mt.gov.

Based on the Environmental Assessment, public comment, and FWP evaluation, it is my decision to proceed with the proposed action, Alternative A, as described in Draft Environmental Assessment "Selective, Mechanical Removal of Nonnative Fishes in the Shields River Watershed.

Sincerely,

Jim Williams, Acting Region Three Supervisor

Montana Fish, Wildlife & Parks

Region Three Montana Fish, Wildlife & Parks
1400 South 19th Ave
Bozeman, MT 59718

September 2, 2014
Decision Notice for:

Selective, Mechanical Removal of Nonnative Fishes in the Shields River Watershed Draft Environmental Assessment

Proposed Action

Montana Fish, Wildlife & Parks (FWP) proposes removal of nonnative rainbow trout from waters upstream of Chadbourne Diversion and removal of nonnative brook trout in waters upstream of a proposed barrier upstream of Crandall Creek as described in the draft Selective, Mechanical Removal of Nonnative Fishes in the Shields River Watershed EA.

Montana Environmental Policy Act

Montana Fish, Wildlife & Parks is required by the Montana Environmental Policy Act (MEPA) to assess significant potential impacts of a proposed action to the human and physical environment. In compliance with MEPA, an Environmental Assessment (EA) was completed for the proposed project by FWP and released for public comment on July 16, 2014.

Public comments on the proposed project were taken from July 16, 2014 through August 15, 2014. The EA Notice was mailed to over 150 groups and individuals.

Summary of Public Comment

FWP received Ten (10) comments regarding the proposed action.

Respondent #1

"Totally agree. Remove all nonnative fish!"

FWP: Thank you for your comment.

Respondent #2

"The removal of brook and rainbow trout is a sound idea, but I would like to know about the status of brown trout in the drainage. ..... I believe that you guys will do what's best for the Shields and its fishery and you have my support, but I wanted to voice my feelings on this subject."

FWP: Thank you for your comment. Under the current proposal brown trout will only be removed above the barrier that is proposed near Crandall Creek. There is currently no documentation of brown trout being present above that location. This project will be used to determine what, if any, impacts

brown trout have on the survival and persistence of Yellowstone cutthroat trout. If it is determined that brown trout negatively affect Yellowstone cutthroat trout, brown trout in the main stem below the project area will be addressed separately from the currently proposed project. Brown trout populations in the main stem of the Shields are currently stable with a variety of age classes and good condition.

Respondent #3

"Why, Why is diversity in a river system bad? Is the removal of "non-natives" a strictly political objective –the Federal government does it in the Park so we have to here? Diversity of species is what helped save the Madison and other rivers when whirling disease hit the Rainbow population of these rivers. The Brownies took over the space vacated by the dying Rainbows. Diversity, in general, is one of the things that make our country so great."

"When and where does this unexplained objective stop? Why just the Shields? Shouldn't the Yellowstone be shocked to remove all non-cutthroat? The Missouri below Holter? Where does the culling of "non-native" species stop? The world-famous Park County spring creeks are major cutthroat spawning areas. Shouldn't the Brown and Rainbow populations of these streams be eliminated? If you try to propose this, I'll bet that major fishing businesses in the State, as well as fishermen all over the country, will join me in marching on Helena."

"Even if God gave me the objective of culling out non-native species, I'd want to ask Him "Lord, how am I to define "non-native"? How far back in time should I look to see what was in these rivers? The Eastern Brook, Brown, and Rainbow trout have been in Montana's river systems for well over a century. They were placed here by the hand of Man, as far as recorded history is concerned (and my own limited reading of it). This diversity has cultivated a massive fly-fishing industry in the State. People come from all over the world to try to catch our wary Browns and the high-jumping Rainbows. The Cuts simply dog it when hooked. They are inferior as a game fish in my personal opinion. And for those few occasions when we kill the trout for food, the Brookies are tops. As for what was in these rivers before recorded history, not even FWP knows."

FWP: Thank you for your comment. Diversity in the particular case is negative because introduced nonnative trout are causing the loss of a native species that evolved in habitats with low trout diversity. The removal of nonnatives is not a political objective. FWP is tasked with conserving fisheries for future generations. This includes native species that are declining as the result of nonnative introductions. The focus of this proposal is on the Shields River because it is a core conservation area in Montana as well as range-wide for Yellowstone cutthroat trout. Removal of nonnative fish in systems such as the Yellowstone and Missouri rivers would not be biologically, socially or politically acceptable.

Respondent #4

"Is that enough quality habitat for cutthroats? Seems kind of silty and probably warm in summer but I don't know it very well only having seen some sections"

FWP: Thank you for your comment. There are approximately 37 connected miles of stream habitat above the proposed barrier near Crandall Creek. This portion of the Shields does not have the sediment or late summer temperature issues that the lower river has. This area has historically held Yellowstone cutthroat trout and will provide the necessary habitat requirements for Yellowstone cutthroat trout to thrive once the competition from nonnative trout is removed.

Respondent #5

"While that is not a popular topic it must be addressed for this project to be successful. Removing the brown and rainbow trout while not addressing stream flow will degrade the fishing experience for all

anglers. The main stem of the river simply gets too low and warm which reduces the amount of oxygen is the water. Not good habitat for cutthroat trout."

FWP: Thank you for your comment. The concerns related to dewatering and high water temperatures that occur in the lower Shields are valid. The Yellowstone cutthroat trout in that part of the river are able to acclimate and survive most likely through movement to more suitable habitat. The focus of the proposed project is the headwaters of the Shields River where significant issues do not exist with dewatering and high temperatures. The intent of this project is to secure some of the best habitat that currently remains and then work to expand conservations areas downstream in the Shields basin by working with landowners to address habitat issues such as dewatering.

Respondent #6

"I disagree with your proposal to wipe out the river of its non-native rainbows, browns, and other trout."
"The Shields river is a thriving river ecosystem and to consider these fish "non native" is absurd. They have been living together since 1889!!"
"Are you going to remove all of these trout from the Yellowstone as well? Mill Creek? All the other river tributaries? "

FWP: Thank you for your comment. Your position has been noted. Rainbow and brown trout were both introduced into Montana waters in the late 1800s. Rainbow trout are native to the west coast and brown trout were brought to the US from Europe. As such they are nonnative species in these waters. There are currently no proposals to remove all of the nonnative trout from the Yellowstone River, Mill Creek, or all of the other tributaries. Any future removals of nonnative trout would only occur after extensive data review, MEPA compliance, and public review and comment.

Respondent #7

"To say I have nothing good to say about your plans for the Shields River is putting it mildly."

FWP: Thank you for your comment. Your position has been noted.

Respondent #8

"wondering how water temps due to excessive de-watering will be addressed...not sure you can give the cutties warm summer water, say "now thrive!" and expect it to actually happen...i was fishing upstream of the green boxes just upstream of Chadbourn yesterday and was surprised how warm it already is."

FWP: Thank you for your comment. The concerns related to dewatering and high water temperatures that occur in the lower Shields are valid. The Yellowstone cutthroat trout in that part of the river are able to adapt and survive most likely through movement to more suitable habitat. The focus of the proposed project is the headwaters of the Shields River where significant issues do not currently exist with dewatering and high temperatures. The intent of this project is to secure some of the best habitat that currently remains and then work to expand conservations areas downstream in the Shields basin by working with landowners to address habitat issues such as dewatering.

Respondent #9

"As I type there are thousands and I mean thousands of fry, since Cuts, Bows and the Hybrids all spawn in the spring most of them are probably one of these three. How in the hell do you propose to eliminate those that are not "native cuts"? I would suggest that short of killing and I mean killing everything in the system this is a physical impossibility.

"After over a hundred years of co-mingling of species can you ever insure that you will ever have a "pure" genetic strain of cutthroats'?"
"There are hundreds of miles of tributaries on the Shields, are you planning on shocking or killing every one of these? How do you ever propose to remove all the Brookies?"
"I have electro-shocked with fish and game in Idaho on many occasions and we both know you never get all of the fish. Throw in the fry and you have the impossible."
"What about all the irrigation diversions?"
"What about all the private ponds, are you going to go on private property and eliminate all the "unwanted species there"? That would make for good conversation!"
"Are you planning on putting cameras at the Chadbourne Diversion so if somebody catches a brown, bow, hybrid or brookie and puts it in the pool above they will be caught?"
"Who is going to pay for this exercise in futility?"
"The Shields is an excellent brown trout fishery that is a fact that cannot be refuted. If you try a "Cherry Creek" approach you are going to ruin a great fishery."
"My comments are not meant to be adversarial or in any way directed at irrigators but the Shields down low is not a great cutthroat fishery. If you want to try this experiment why not try it up towards the headwater for ten years and see how it works."

FWP: Thank you for your comment. The focus of the proposed project is the headwaters of the Shields River where a limited number of nonnative trout exist with Yellowstone cutthroat trout in approximately 37 miles of connected streams. As described in the EA the US Forest Service is proposing to construct a fish barrier on the Shields River near Crandall Creek. This barrier will prevent nonnative trout from entering this area after they are removed. In addition to electrofishing FWP plans to incorporate other mechanical methods of fish capture, such as trap netting, in order to remove all of the nonnative fish upstream of the proposed Crandall Creek barrier. FWP policy currently dictates that private ponds above the Chadbourne Diversion on the lower Shields are prohibited from being stocked with any fish other than Yellowstone cutthroat trout. As outlined in the EA the current proposed action is slated for 10 years with the primary focus area of the headwaters of the Shields River.

Repondent #10
"Why not just pick a couple of headwaters creeks, put up fish barriers and try to reestablish the cutts. Every tributary has nonnative fish and making the entire drainage above the dam cutts only is an impossible dream."
"plan for the headwater streams above the proposed barrier seems reasonable. To affect the mainstem and its tributaries is another matter. The shear size and complexity of the drainage makes it a daunting task at best. There's hundreds of miles of streams, hundreds of miles of ditches, springs, seeps and ponds. It seems impossible to me. My fisherman's bias also says that messing with a fine trout stream like Rock Cr would be a mistake especially since the cutts seem to be holding their own. Why not do barriers and removal in the headwaters and maybe pick some realistic battles in the lower elevations."

FWP: Thank you for your comment. As presented in the EA the main focus for nonnative trout removal is in the headwaters above the proposed barrier near Crandall Creek as suggested in the above comment. Your comments for a future approach to the lower river are noted.

Decision

Based on the Environmental Assessment, public comment, and FWP evaluation, it is my decision approve the proposed action, Alternative A, of removal of nonnative rainbow trout and rainbow x Yellowstone cutthroat trout hybrids from waters upstream of

Chadbourne Diversion and removal of nonnative brook trout in waters upstream of a proposed barrier upstream of Crandall Creek for a period of 10 years, ending in December 2024. I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environmental Impact Statement is not required. it is my decision to accept the EA as proposed.

Jim Williams, Acting Region Three Supervisor